

1 JEFFREY I. PITEGOFF, ESQ.
Nevada Bar No. 005458
2 MORRIS, SULLIVAN, LEMKUL & PITEGOFF
3770 Howard Hughes Parkway, Suite 170
3 Las Vegas, Nevada 89169
4 Telephone No. (702) 405-8100
Fax No. (702) 405-8101
pitegoff@morrissullivanlaw.com

5 *Attorney for Defendants*
6

7 **UNITED STATES DISTRICT COURT**
8 **STATE OF NEVADA**

9 SHAHEEN W. AHMAD, an individual
10

11 Plaintiff,

12 vs.
13 UNIVERSITY MEDICAL CENTER OF
SOUTHERN NEVADA, a political
14 subdivision of Clark County, State of Nevada;
Board of Trustee of Clark County
15

16 Defendants.

17 CASE NO: 2:15-cv-01001-GMN-NJK

18
19 **DEFENDANTS UNIVERSITY
MEDICAL CENTER OF SOUTHERN
NEVADA'S MOTION FOR RELIEF
FROM EARLY NEUTRAL
EVALUATION CONFERENCE
ATTENDANCE REQUIREMENTS**

20
21 Defendants UNIVERSITY MEDICAL CENTER OF SOUTHERN NEVADA
22

23 (hereinafter "UMC"), hereby moves this Court for an Order Relieving UMC from the Early
24 Neutral Evaluation (hereinafter "ENE") Conference attendance requirements. The ENE
25 Conference is scheduled for October 6, 2015. This motion is brought pursuant to Magistrate
26 Judge Peggy A. Leen's Order, Docket No. 11 and Local Rule 16-6.
27

28 ////

////

///

///

This Motion is based on the following memorandum of points and authorities, the papers and pleadings already on file with the Court, and any evidence presented at hearing, should one be allowed.

DATED this 6th day of August, 2015.

MORRIS, SULLIVAN, LEMKUL & PITEGOFF

/s/ Jeffrey Pitegoff
JEFFREY I. PITEGOFF, ESQ.
Nevada Bar No. 005458
3770 Howard Hughes Parkway, Suite 170
Las Vegas, NV 89169
Attorney for Defendants

MEMORANDUM OF POINTS AND AUTHORITIES

Defendant, UMC, hereby requests an exception to the ENE Conference attendance requirements. As the Court is aware, UMC is part of Clark County and a public entity. As such, all authority for settlements and ultimate resolution of matters must be approved by the County Commissioners. UMC intends to have Doug Spring appear as its representative. Mr. Spring is the Director of Human Resource Operations for UMC. He has appeared for ENE Conferences on behalf of UMC in the past, and will present any potential resolution for the County Commissioner's consideration. Consequently, Defendant respectfully requests relief from the attendance requirements.

CONCLUSION

Based on the foregoing reasons, Defendants', respectfully request an Order relieving

111

111

111

111

1 UMC from the ENE Conference attendance requirements, and to allow Doug Spring, to appear at
2 the ENE Conference set for October 6, 2015 on behalf of Defendant, UMC.

3

4

DATED this 6th day of August, 2015.

5

6

MORRIS, SULLIVAN, LEMKUL &
7 PITEGOFF

8

/s/Jeffrey Pitegoff

9

10

11

JEFFREY I. PITEGOFF, ESQ.
Nevada Bar No. 005458
3770 Howard Hughes Parkway, Suite 170
Las Vegas, NV 89169
Attorney for Defendants

12

13

14

15

16

IT IS SO ORDERED this 10th day
of August, 2015.

17



18

Peggy A. Leen
United States Magistrate

19

20

21

22

23

24

25

26

27

28